

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

§

V.

§

DARVI HINOJOSA

§

§

CAUSE NO. 4:24-CR-00543

§

**DEFENDANT DARVI HINOJOSA'S
UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL**

THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, DARVI HINOJOSA, by and through his attorney of record, J. Raynor Carr & Associates, P.C. and files this Unopposed Motion for Continuance of Trial, and for cause would show the following:

1. Darvi Hinojosa requests this Court continue the trial of this matter, including dates and deadlines for motions filing.
2. Mr. Hinojosa is charged by way of indictment with one count of Attempted Murder in Aid of Racketeering Activity in violation of 18 U.S.C. §1959(a)(5) and (2) and one count of Using, Carrying, Brandishing, or Discharging a Firearm During and in Relation to a Crime of Violence in violation of 18 U.S.C. §924(c)(A)(iii) and 2.
3. The Government has turned over some discovery in this matter; however, additional voluminous discovery is expected. Defense Counsel will need time to review said discovery materials and prepare for trial.
4. Motions are due November 8, 2024. Pretrial is set for December 6, 2024, at 10:30 A.M., and trial is set for December 16, 2024, at 9:00 A.M. in this Court.

5. This is Mr. Hinojosa's first Motion for Continuance, and the Government does not oppose this motion.

6. Mr. Hinojosa and his Counsel request an additional 90 days to prepare for trial.

Defense Counsel will be out of her office from February 28, 2025, to March 7, 2025, and respectfully requests that trial not be set during this time.

7. This motion is not sought for unnecessary delay. It coincides with the ends of justice, and does not violate the Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A).

WHEREFORE, Darvi Hinojosa requests this Court grant his unopposed motion for continuance and issue an Amended Scheduling Order reflecting a minimum 90-day extension of time to prepare motions and to prepare for trial of this matter.

Respectfully submitted,

/s/ Joyce Raynor
Joyce Raynor
Attorney for Defendant,
Darvi Hinojosa
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Certificate of Conference

I certify that on the 4th day of November 2024, I conferred with Assistant U.S. Attorney and Defense Counsel of Co-Defendants on the filing of this Motion, and the government is not opposed. Co-Defendant's Counsel may join the motion but had not upon the filing of said motion.

/s/ Joyce Raynor
Joyce Raynor

Certificate of Service

I certify that a copy of this Unopposed Joint Motion for Continuance of Trial was served on all interested parties by the district clerk's CM/ECF electronic filing system on this the 5th day of November 2024.

/s/ Joyce Raynor
Joyce Raynor

**IN THE UNITED STATES DISTRICT COURT
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V.

CAUSE NO. 4:24-CR-00543

DARVI HINOJOSA

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§

**DEFENDANT DARVI HINOJOSA'S
UNOPPOSED JOINT MOTION FOR CONTINUANCE OF TRIAL**

ON THIS DAY, the Court, hereby, GRANTS Defendant Darvi Hinojosa's Joint, Unopposed Motion for Continuance of Trial.

This Court finds that the ends of justice outweigh the public interest in granting this continuance and that there is excusable delay pursuant to the Speedy Trial Act. An Amended Scheduling Order follows:

Motions are due: _____,

Responses are due: _____,

Pre-trial Conference is scheduled for: _____,

Trial is set for: _____.

SIGNED ON THIS _____ day of _____ 2024.

**HONORABLE KEITH P. ELLISON
UNITED STATES DISTRICT JUDGE**